Case 1:20-cr-00037-LAK Document 8 Filed 03/10/20 Page 1 of 2

## Federal Defenders OF NEW YORK, INC.

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USDC SDNY

DOCUMENT

David E. Patton
Executive Director

March 10, 2020

Southern District of New York Jennifer L. Brown Attorney-in-Charge

VIA ECF
The Honorable Lewis A. Kaplan
United States District Judge
United States District Court

Southern District of New York

500 Pearl Street

New York, New York 10007

Re: United States v. Shelly Washington,

20 CR 37 (LAK)

Dear Judge Kaplan:

With the consent of the government, I write to adjourn the dates by which Ms. Washington must file her pre-trial motions and the next pre-trial conference. The parties propose the following schedule:

Defendant's motions, if any, must be filed by May 12, 2020; Government's response, if any, must be filed by June 2, 2020; Defendant's reply, if any, must be filed by June 9, 2020; and A status conference any date or time convenient for the Court in June.

The currently scheduled trial date of October 19, 2020 need not move.

I require the additional time to review the discovery, some of which is being produced today, with my client to effectively prepare her pretrial motions and to accommodate my work schedule which includes trials in both March and April.

SOORDERED

LEWIS A. KAYLAN, ZOZ

Case 1:20-cr-00037-LAK Document 8 Filed 03/10/20 Page 2 of 2

The Honorable Kaplan Page 2 of 2 March 10, 2020

Re: United States v. Shelly Washington, 20 CR 37 (LAK)

To accommodate this request, we have no objection to excluding time for purposes of speedy trial calculations until the adjourned status conference date.

Thank you for your consideration of this application.

Respectfully submitted,
/s/ Julia Gatto
Julia L. Gatto
Assistant Federal Defender
(212) 417-8750

cc: AUSAs David Robles/Jacob Warren (via ECF)